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November 7, 2019

Via ECF

Hon. Judge Lois Bloom, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza
Brooklyn, NY 11201

Re: Plaintiffs Letter Requesting Leave to Extend Time to Complete Discovery

1:18-cv-06616 Xing et al v. Mayflower International Hotel Group Inc. et al

Dear Honorable Judge Bloom:

We represent the Plaintiffs' in the above referenced matter. We write respectfully to request leave to extend time to complete discovery from August 28, 2019 to February 27, 2020. This is Plaintiffs Second request for extension of time to complete discovery and Defendants do not consent to this request. Granting such request will not prejudice any party.

On January 28, 2019, Your Honor ordered parties to complete discovery by August 28, 2019. On August 14, 2019 the parties jointly requested Your Honor to extend time to complete discovery and the parties request is still pending before Your Honor to rule. Additionally, before Your Honor is another motion pending to rule, Plaintiffs motion for conditional collective certification which was filed on June 14, 2019. As of this filing, Parties have completed the fact discovery and are trying to schedule the depositions. However, Plaintiffs believe it is the best use of the parties resources, to schedule the depositions in the present matter after the close of opt-in period, considering the amount of Plaintiffs and potential opt-ins after the ruling on the motion for conditional collective certification.

In light of this and to save the time and costs of all the parties, the undersigned respectfully requests Your Honor to extend the time to complete discovery until February 27, 2020. Granting such requests will not prejudice any party as the Trial date is yet to be set.

We thank this court for its time and consideration in this matter and apologize for any inconveniences caused to this court.

Respectfully Submitted,

/s/ John Troy
John Troy

Cc: all counsel of record via *ECF*